My concerns about this do not involve the reorganization of the Copyright Office hierarchy as much as the Information Technology upgrades.

I agree that the Copyright Office should have sufficient autonomy to decide between using the Library of Congress' datacenter or to evaluate other options, and that there should be a searchable digital database.

My concern for the first of these two items is that any final IT needs decision does not wind up being cloud-based; the system should require more security than a cloud-based solution would provide.

My concern for the second of these two items is that copyrighted works should only become accessible through the searchable digital database after they are PUBLISHED: I often copyright my material in a rough form before taking it into a recording studio to produce the polished version which I then copyright as published. I would not want anyone to be able to access the initial rough concept until the polished version is published.

Thank you for the opportunity to comment.

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